

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

|                                     |   |                            |
|-------------------------------------|---|----------------------------|
| JANE DOE #1, and JANE DOE #2, on    | ) |                            |
| behalf of themselves and all others | ) |                            |
| similarly situated,                 | ) |                            |
|                                     | ) |                            |
| Plaintiffs,                         | ) | CIVIL ACTION NO:           |
|                                     | ) | 7:21-cv-00220-LSC          |
| v.                                  | ) |                            |
|                                     | ) | Honorable L. Scott Coogler |
| MG FREESITES, LTD, d/b/a            | ) |                            |
| “PORNHUB”; MG FREESITES II          | ) | UNOPPOSED                  |
| LTD; MINDGEEK S.A.R.L.;             | ) |                            |
| MINDGEEK USA INCORPORATED;          | ) |                            |
| MG CY HOLDINGS LTD;                 | ) |                            |
| MINDGEEK CONTENT RT LIMITED;        | ) |                            |
| 9219-1568 QUEBEC, INC., d/b/a       | ) |                            |
| MINDGEEK; MG BILLING LTD,           | ) |                            |
|                                     | ) |                            |
| Defendants.                         | ) |                            |

**PROPOSED REVISED SCHEDULING ORDER (New Rules)**

This order is entered under Fed. R. Civ. P. 16(b) based on the parties joint motion for a revised scheduling order.

1. Dispositive Motions: All potentially dispositive motions must be filed by One month after the close of expert discovery.
2. Expert Testimony: Unless modified by order of the court, the disclosures of expert witnesses – including a complete report under Fed. R. Civ. P. 26(a)(2)(B) from any specially retained or employed expert –are due:

From plaintiff: One month after the resolution of the issue of Class Certification.

From defendant: One month after the Plaintiffs' expert disclosures are due.

Rebuttal: One month after the Defendants' expert disclosures are due.

All expert discovery including depositions shall be completed within 6 weeks of service of rebuttal reports.

3. Discovery limitations and cutoffs:

a. The discovery limitations will remain as provided in this Court's Scheduling Order, doc. 33,

b. Unless modified by order for good cause shown:

Supplementation: Supplementation of disclosures and discovery under Fed. R. Civ. P. 26(e)(1) due by July 14, 2023.

Deadline: All fact discovery must be commenced in time to be completed by August 14, 2023.

4. Class Certification:

Motion: Plaintiffs' motion for class certification is due by September 12, 2023.

Response: Defendants' response to Plaintiffs' motion for class certification is due by October 10, 2023.

Reply: Plaintiffs' reply brief in support of class certification is due by October 24, 2023.

Hearing: On or after November 14, 2023

5. JOINT STATUS REPORT:

Deadline: 14 days after the close of expert discovery

On or before the close of discovery, the parties shall submit a JOINT STATUS REPORT including: (a) A narrative statement of the case, which briefly summarizes the case without using "color" words or argument; (b) the undisputed facts for which there is no reasonable basis for disagreement, set out in separately numbered

paragraphs; (c) each plaintiff's claims, including each legal theory relied upon and the factual allegations he/she expects to prove in support of each legal theory; (d) each claim against him, each defendant's legal theory, including the factual allegations he/she expects prove in support of each such legal theory.

The joint status report will be used in any subsequent summary judgment proceedings and shall be incorporated, in substantially unchanged form, in the final pretrial order. In setting out claims and defenses, vague, conclusory and general claims and allegations are not acceptable. In other words, no weasel wording. By this stage of the proceedings the parties are expected to know what the claims and defenses are and must state precisely the issues expected to be tried. Each claim or defense must be set out in separately numbered paragraph, appropriately labeled. Think common law pleading. Under each claim or defense, the party shall list any citations to the major cases, statutes, etc. that support the legal theory.

6. Additional conference(s): Four months after the resolution of the motion for class certification.

7. Final Lists: Final lists of trial witnesses, exhibits, and objections under Fed. R. Civ. P. 26(a)(3) must be served and filed:

Witnesses: plaintiffs by 30 days before trial  
defendants by 30 day before trial

Exhibits: plaintiffs by 30 days before trial  
defendants by 30 day before trial

Objections are to be filed within 14 days after receipt of above list(s).

8. Jury Trial: Five months after the dispositive motion deadline to be held in Tuscaloosa, AL. Estimated trial time by parties is 5 days.

Marking of Exhibits: Each party that anticipates offering as substantive evidence as many as six (6) or more exhibits shall premark its exhibits in advance of trial, using exhibit labels and lists available from the Clerk of Court. By the time of trial, a copy of the exhibit list shall be served and filed, with the exhibits being made available for inspection by opposing counsel; the presentation of evidence at trial will not ordinarily be interrupted for opposing counsel to examine a document that has been so marked and made available for inspection.

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

DATED: January X, 2023.

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Chief Judge L. Scott Coogler  
United States District Court  
Northern District of Alabama